

Exhibit 2

From: Tenreiro, Jorge <tenreiroj@SEC.GOV>
Sent: Tuesday, December 31, 2019 5:11 PM
To: Drylewski, Alexander C (NYC); Charmani, Thania (NYC); McGrath, Kevin; Stewart, Ladan F; Levine, Alison R
Cc: Malloy, Christopher P (NYC)
Subject: [Ext] RE: SEC v. Telegram, et al., No. 19-cv-9439(PKC) (S.D.N.Y.)

Thanks Alex.

Talk to you soon, Happy New Year.

From: Drylewski, Alexander C
Sent: Tuesday, December 31, 2019 5:08 PM
To: Tenreiro, Jorge ; Charmani, Thania ; McGrath, Kevin ; Stewart, Ladan F ; Levine, Alison R
Cc: Malloy, Christopher P
Subject: RE: SEC v. Telegram, et al., No. 19-cv-9439(PKC) (S.D.N.Y.)

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Jorge – we objected to your requests for financial documentation when they were first made and you let the issue lie until suddenly pressing for voluminous bank statements late last week in the midst of the holidays following our objections to your Rule 30(b)(6) topics. I think we've been more than reasonable in attempting to accommodate your purported need for this information despite the questionable relevance, and as mentioned, will continue to follow up with our client. We agree to your proposed procedure below in the event you feel you need to make an application to the Court on Thursday.

Thanks,
Alex

From: Tenreiro, Jorge <tenreiroj@SEC.GOV>
Sent: Tuesday, December 31, 2019 4:54 PM
To: Drylewski, Alexander C (NYC) <Alexander.Drylewski@skadden.com>; Charmani, Thania (NYC) <Thania.Charmani@skadden.com>; McGrath, Kevin <McGrathK@SEC.GOV>; Stewart, Ladan F <stewartla@SEC.GOV>; Levine, Alison R <levineali@SEC.GOV>
Cc: Malloy, Christopher P (NYC) <Christopher.Malloy@skadden.com>
Subject: RE: [Ext] RE: SEC v. Telegram, et al., No. 19-cv-9439(PKC) (S.D.N.Y.)

Thanks Alex:

I understand that there are delays, but our request for full financial information has been pending since the outset of the litigation. We agree that we do not need to burden the Court if the parties can come to an agreement on their own. Unfortunately, the time left before the deposition leaves us with little choice. If we are forced to seek relief from the Court on Thursday morning, will you agree to cut your time to respond, currently contemplated by the Scheduling Order to three business days, to one business day? If so, we can balance protecting our ability to seek relief in time for the Court to consider the dispute before the depositions, with our mutual interest in trying to resolve our disputes amicably.

If can agree to this procedure, we will hold off until Thursday. If we cannot, I will include your email in our submission as per your request.

Thanks,

Jorge

From: Drylewski, Alexander C <Alexander.Drylewski@skadden.com>

Sent: Tuesday, December 31, 2019 4:49 PM

To: Tenreiro, Jorge <tenreiroj@SEC.GOV>; Charmani, Thania <Thania.Charmani@skadden.com>; McGrath, Kevin <McGrathK@SEC.GOV>; Stewart, Ladan F <stewartla@SEC.GOV>; Levine, Alison R <levineali@SEC.GOV>

Cc: Malloy, Christopher P <Christopher.Malloy@skadden.com>

Subject: RE: [Ext] RE: SEC v. Telegram, et al., No. 19-cv-9439(PKC) (S.D.N.Y.)

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Hi Jorge – unfortunately, I have to correct the record based on your below email. On Friday, we discussed your request for certain Telegram bank records regarding TON. We questioned, and continue to question, the relevance of those documents and do not believe we have ever received an adequate response. Nevertheless, we offered to prepare our corporate representative to testify regarding the amount of funds received and a general breakdown of Telegram's expenditures, an offer you rejected and continued to demand all bank records. In order to avoid a dispute, we said that we would ask our client for this information. In the meantime, we realized that Telegram had already produced certain bank records to FinCEN and thus promptly produced them to you on Friday, believing them to be what you wanted – i.e., bank records showing payments received from private purchasers in light of your comment questioning – without basis – the amount Telegram raised. You then clarified to us yesterday that you wanted bank records also showing all outflows or "debit" payments from Telegram's account. While we continued to dispute the relevance of this information, we agreed to follow up with our client for it, which we've done. As you know, our client is overseas and it's the holidays, and we're still awaiting a response. I'm sure you can understand, as you've mentioned having the same difficulties getting responses on your side relating to other issues. We've followed up again and will keep you posted as soon as we receive a response.

If you feel compelled to burden the Court with a motion under these circumstances, where we've agreed to ask for this information (which is tangentially related to the action, if at all), done what we can to promptly provide you with what information we have, and are still awaiting a response, we request that you include this email in your submission so that the Court has an accurate picture of the record.

Thanks and happy to discuss if you'd like.

Alex

From: Tenreiro, Jorge <tenreiroj@SEC.GOV>

Sent: Tuesday, December 31, 2019 4:21 PM

To: Drylewski, Alexander C (NYC) <Alexander.Drylewski@skadden.com>; Charmani, Thania (NYC) <Thania.Charmani@skadden.com>; McGrath, Kevin <McGrathK@SEC.GOV>; Stewart, Ladan F <stewartla@SEC.GOV>; Levine, Alison R <levineali@SEC.GOV>

Cc: Malloy, Christopher P (NYC) <Christopher.Malloy@skadden.com>

Subject: [Ext] RE: SEC v. Telegram, et al., No. 19-cv-9439(PKC) (S.D.N.Y.)

Hi Alex:

We were under the clear understanding that you spoke with your clients last Friday and they agreed to produce unredacted bank statements showing all credits and debits after we had an extended meet and confer regarding our need for bank statements showing not just unredacted credits but also unredacted debits. See attached emails. Thus, we do not understand why you need to confer again with your client about this. This is causing further delay in resolving this issue and our receipt of these records, which we need prior to the deposition of Pavel Durov. Can you at least advise us whether you will receive an answer from your client today? If you cannot provide that assurance, we feel compelled to file a motion with the judge today regarding this issue, if we are to have any hope of a decision prior to Mr. Durov's deposition next Tuesday and Wednesday in Dubai.

Thanks

From: Drylewski, Alexander C <Alexander.Drylewski@skadden.com>
Sent: Tuesday, December 31, 2019 3:55 PM
To: Tenreiro, Jorge <tenreiroj@SEC.GOV>; Charmani, Thania <Thania.Charmani@skadden.com>; McGrath, Kevin <McGrathK@SEC.GOV>; Stewart, Ladan F <stewartla@SEC.GOV>; Levine, Alison R <levineali@SEC.GOV>
Cc: Malloy, Christopher P <Christopher.Malloy@skadden.com>
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As mentioned yesterday, we are looking into the issue and will revert as promptly as possible once we've spoken with our client.

Alex

From: Tenreiro, Jorge <tenreiroj@SEC.GOV>
Sent: Tuesday, December 31, 2019 3:54 PM
To: Drylewski, Alexander C (NYC) <Alexander.Drylewski@skadden.com>; Charmani, Thania (NYC) <Thania.Charmani@skadden.com>; McGrath, Kevin <McGrathK@SEC.GOV>; Stewart, Ladan F <stewartla@SEC.GOV>; Levine, Alison R <levineali@SEC.GOV>
Cc: Malloy, Christopher P (NYC) <Christopher.Malloy@skadden.com>
Subject: RE: [Ext] RE: SEC v. Telegram, et al., No. 19-cv-9439(PKC) (S.D.N.Y.)

Thanks Alex.

Do you have an answer to the question we discussed last week and again yesterday: i.e., will you produce bank records showing unredacted debits in addition to just credits?

Thank you

From: Drylewski, Alexander C <Alexander.Drylewski@skadden.com>
Sent: Tuesday, December 31, 2019 3:40 PM
To: Tenreiro, Jorge <tenreiroj@SEC.GOV>; Charmani, Thania <Thania.Charmani@skadden.com>; McGrath, Kevin <McGrathK@SEC.GOV>; Stewart, Ladan F <stewartla@SEC.GOV>; Levine, Alison R <levineali@SEC.GOV>
Cc: Malloy, Christopher P <Christopher.Malloy@skadden.com>
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Noted

From: Tenreiro, Jorge <tenreiroj@SEC.GOV>

Sent: Tuesday, December 31, 2019 3:25 PM

To: Charmani, Thania (NYC) <Thania.Charmani@skadden.com>; McGrath, Kevin <McGrathK@SEC.GOV>; Stewart, Ladan F <stewartla@SEC.GOV>; Levine, Alison R <levineali@SEC.GOV>

Cc: Drylewski, Alexander C (NYC) <Alexander.Drylewski@skadden.com>; Malloy, Christopher P (NYC) <Christopher.Malloy@skadden.com>

Subject: [Ext] RE: SEC v. Telegram, et al., No. 19-cv-9439(PKC) (S.D.N.Y.)

Please note the court reporter assigned for both January 7 & January 8, 2020 is **Leah Willersdorf.**

Please note the videographer assigned for both January 7 & January 8, 2020 is **Linda Fleet.**

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Further information about the firm, a list of the Partners and their professional qualifications will be provided upon request.

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